

E. Richard Dressel, Esquire (ED1793)

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Local counsel for Claimants Giovanni Sosa and Evan C. Plotkin

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

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In re:	:	Chapter 11
	:	
LTL MANAGEMENT LLC,	:	Case No. 21-30589(MBK)
Debtor.	:	Honorable Michael B. Kaplan

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**VERIFIED RULE 2019.1 DISCLOSURE**

Lex Nova Law, LLC (hereinafter “Lex Nova Law”) submits this verified statement in accordance with Rule 2019 of the Federal Rules of Bankruptcy Procedure.

1. Lex Nova Law acts as local counsel for Cooney and Conway as counsel for Giovanni Sosa and local counsel for the Law Offices of DOBS as local counsel for Evan C. Plotkin.

2. Lex Nova Law, LLC was retained by Cooney and Conway on behalf of Giovanni Sosa (“Mr. Sosa) and the Law Offices of DOBS on behalf of Evan C. Plotkin (“Mr. Plotkin”) in connection with the instant bankruptcy case. An exemplar copy of engagement agreement authorizing Lex Nova Law to act on behalf of each Claimant and providing for the payment of Lex Nova Law fees and costs has been filed with this Statement is attached as Exhibit A. Lex Nova Law’s interest relative to each Claimant is outlined in the exemplar retainer agreements and set forth by New Jersey Court Rule 1:21-7.

3. As of the date of this Statement, each Claimant maintains an individual economic interest against the Debtor LTL Management, LLC.

4. Mr. Sosa resides at 7918 Discovery Road, Regina, Saskatchewan, CAN S4Y A7. Mr. Sosa possesses an unliquidated claim. Mr. Sosa's claim is for mesothelioma due to exposure to asbestos containing talc products including, but not limited to, those for which J&J or its affiliated entities hold liability. The current stage of Mr. Sosa's disease is unknown.

5. Mr. Plotkin resides at 43 Twinbrook Drive, Somers, CT 06071. Mr. Plotkin possesses an unliquidated claim. Mr. Plotkin's claim is based upon his diagnosis of mesothelioma due to exposure to asbestos containing talc products including, but not limited to, those for which J&J or its affiliated entities hold liability. The current state of Mr. Plotkin's disease is unknown.

6. The information set forth in this Statement is intended only to comply with Bankruptcy Rule 2019 and not for any other purpose.

7. The undersigned reserves the right to amend or supplement this Disclosure in accordance with the requirements of Bankruptcy Rule 2019 at any time in the future.

Pursuant to Rule 9011(e) of the Federal Rules of Bankruptcy Procedure, I verify under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Date: June 8, 2022

*/s/ E. Richard Dressel*  
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